

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL RICHARD LYNCH and)
STEPHEN KEITH CHAMBERLAIN,)
)
Defendants.)
_____)

CASE NO. CASE NO. CR 18-577 CRB
STIPULATION REGARDING BUSINESS
RECORDS OF M&T BANK

The United States and Defendants Michael Richard Lynch and Stephen Keith Chamberlain hereby stipulate that the following documents are (1) business records pursuant to Federal Rule of Evidence 803(6) because they were made at or near the time by someone with knowledge; kept in the course of regularly conducted business; and made as part of a regular business activity; and (2) are authentic pursuant to Federal Rule of Evidence 901, 902(11), 902(13), and/or 902(14).

Exhibit	Description	Custodian
510	M&T Bank Records for January 2010 showing incoming wire for David Truitt from Autonomy	M&T Bank
627	Posted Autonomy – Zantaz Check No. 1702 to Capax Discovery LLC, dated March 10, 2010 in the amount of \$1,425,000.00	M&T Bank

STIP RE BUSINESS RECORDS (M&T BANK) 1
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662	M&T Bank Account Activity for Capax Discovery LLC – Account No. 9850261331 Statement Period March 1, 2010 – March 31, 2010	M&T Bank

DATED: March 14, 2024

Respectfully submitted,

PATRICK D. ROBBINS
Attorney for the United States,
Acting Under Authority Conferred by
28 U.S.C. § 515

/s/

ROBERT S. LEACH
ADAM A. REEVES
KRISTINA N. GREEN
ZACHARY G.F. ABRAHAMSON
Assistant United States Attorneys

DATED: March 14, 2024

CLIFFORD CHANCE US LLP

/s/

CHRISTOPHER J. MORVILLO
Attorneys for Defendant Michael Lynch

DATED: March 14, 2024

BIRD, MARELLA, BOXER, WOLPERT,
NESSIM, DROOKS, LINCENBERG, &
RHOW, P.C.

/s/

GARY S. LINCENBERG
Attorneys for Defendant Stephen
Chamberlain